

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT**

**Permitting and Compliance Division  
1520 E. Sixth Avenue  
P.O. Box 200901  
Helena, Montana 59620-0901**

**Stimson Lumber Company  
Bonner Operation  
P.O. Box 1120  
Bonner, MT 59823**

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

| <b>Facility Compliance Requirements</b>                            | <b>Yes</b> | <b>No</b> | <b>Comments</b>                                     |
|--|------------|-----------|---|
| Source Tests Required  | X          |           | Method 5 and Method 9                               |
| Ambient Monitoring Required  |            | X         |   |
| COMS Required  |            | X         |   |
| CEMS Required  |            | X         |   |
| Schedule of Compliance Required                                    |            | X         |   |
| Annual Compliance Certification and Semiannual Reporting Required  | X          |           |   |
| Monthly Reporting Required   |            | X         |   |
| Quarterly Reporting Required                                       |            | X         |   |
| <b>Applicable Air Quality Programs</b>                             |            |           |   |
| ARM Subchapter 7 Preconstruction Permitting                        | X          |           | Permit #2806-04                                     |
| New Source Performance Standards (NSPS)                            | X          |           | 40 CFR 60, Subpart Dc                               |
| National Emission Standards for Hazardous Air Pollutants (NESHAPS) | X          |           | No Except for<br>40 CFR 6,1 Subpart M               |
| Maximum Achievable Control Technology (MACT)                       |            | X         | Not at this time.                                   |
| Major New Source Review (NSR)                                      |            | X         |   |
| Prevention of Significant Deterioration (PSD)                      | X          |           | Source is major but has not<br>undergone PSD review |
| Risk Management Plan Required (RMP)                                |            | X         |   |
| Acid Rain Title IV   |            | X         |   |
| State Implementation Plan (SIP)                                    | X          |           | General SIP   |

## TABLE OF CONTENTS

|   |           |
|---|-----------|
| <b>FACILITY COMPLIANCE REQUIREMENTS .....</b>                       | <b>1</b>  |
| <b>SECTION I. GENERAL INFORMATION .....</b>                         | <b>3</b>  |
| A. PURPOSE .....  | 3         |
| B. FACILITY DESCRIPTION.....  | 3         |
| C. FACILITY BACKGROUND INFORMATION.....                             | 3         |
| D. CURRENT PERMITTING ACTION OP2806-03 .....                        | 4         |
| E. TAKING AND DAMAGING ANALYSIS .....                               | 5         |
| F. COMPLIANCE DESIGNATION.....                                      | 5         |
| <b>SECTION II. SUMMARY OF EMISSION UNITS .....</b>                  | <b>6</b>  |
| A. FACILITY PROCESS DESCRIPTION.....                                | 6         |
| B. EMISSION UNITS AND POLLUTION CONTROL DEVICE IDENTIFICATION ..... | 6         |
| <b>SECTION III. PERMIT TERMS.....</b>                               | <b>9</b>  |
| A. EMISSION LIMITS AND STANDARDS .....                              | 9         |
| B. STRATOSPHERIC OZONE DEPLETING SUBSTANCES .....                   | 9         |
| C. MONITORING AND TESTING REQUIREMENTS .....                        | 10        |
| D. RECORDKEEPING REQUIREMENTS.....                                  | 12        |
| E. REPORTING REQUIREMENTS .....                                     | 13        |
| F. PUBLIC NOTICE.....   | 13        |
| <b>SECTION IV. NON-APPLICABLE REQUIREMENTS ANALYSIS .....</b>       | <b>14</b> |
| <b>SECTION V. FUTURE PERMIT CONSIDERATIONS.....</b>                 | <b>15</b> |
| A. MACT STANDARDS.....  | 15        |
| B. NESHAP STANDARDS.....  | 15        |
| C. NSPS STANDARDS.....  | 15        |
| D. RISK MANAGEMENT PLAN .....                                       | 15        |

## SECTION I. GENERAL INFORMATION

### A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emissions units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the EPA and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in Permit Application #OP2806-01 and Preconstruction Permit #2806-04 submitted on July 6, 1999, and additional submittals on July 14, 1999, September 10, 1999, October 19, 1999, and December 7, 1999, the original application submitted by Stimson Lumber Company (Stimson) on July 12, 1995, and the additional submittals on September 25, 1996, April 30, 1997, and September 9, 2002. The request for the administrative amendment (OP2806-03) was received on October 6, 2003.

### B. Facility Description

The Stimson facility in Bonner consists of both a studmill and a plywood mill. The studmill falls under Standard Industrial Classification (SIC) Code 2421 and includes a sawmill, drying kilns and planer. The plywood mill falls under SIC code 2436. Two boilers support the facility, a Riley-Stoker hog fuel fired boiler, which supplies steam to both mills, and a Nebraska natural gas fired boiler as a backup to the hog fuel boiler.

Stimson's Bonner facility is located in the NE $\frac{1}{4}$ , Section 21, NW $\frac{1}{4}$ , Section 22, Township 13 North, Range 18 West, of Missoula County. The facility is situated on the south bank of the Blackfoot River in Bonner, Montana.

### C. Facility Background Information

The Bonner facility was originally constructed in the 1920's by the Anaconda Company and consisted of only a sawmill. Permit #41 was issued in 1969 for the construction of wood waste-fired boiler #1. Emissions from the boiler are controlled with a wet scrubber. In 1972, U.S. Plywood, a division of Champion International, purchased the mill. In 1973, U.S. Plywood was issued Air Quality Permit #604-082773 for the construction of a plywood manufacturing plant. In 1974, the facility was issued Preconstruction Permit #795-031375 for the construction of a veneer gas incineration system, which routed the veneer dryer exhaust gas to the boiler for emissions control. In 1994, Stimson Lumber purchased the facility. Permit #2806-00 was issued for the transfer of ownership. Permit #2806-01 was issued in 1994 for the #2 wood-waste-fired boiler. This boiler was constructed in 1974 and permitted by Missoula County, but had not been incorporated into the permit. Emissions from this boiler are also controlled with a wet scrubber. Permit #2806-02 was issued in 1995 for the addition of a veneer scarfing unit to join short pieces of veneer into longer pieces. Permit #2806-03 was issued in 1997 for the replacement of the #2 wood-fired boiler with a Nebraska natural-gas-fired boiler.

Stimson's initial operating permit application was deemed administratively complete on July 12, 1995. Permit OP2806-00 was issued final and effective on September 4, 1998.

On July 6, 1999, Stimson submitted an application for a preconstruction and an operating permit for the Duratemp® Plywood Prime Line (Preconstruction Permit #2806-04 and Operating Permit #OP2806-01). In addition, Stimson also asked, in subsequent letters to the Department of Environmental Quality (Department), that testing requirements for some cyclones, the S08 Planer

Baghouse #4, and the P08 Sander Baghouse be removed from the operating permit. In the interim, the Department had granted Stimson a nine-month extension to perform the required testing.

The Department asked Stimson to provide manufacturer's data to verify the emissions from the P08 Sander Baghouse. The P08 Sander Baghouse was designed in such a manner that a standard Method 5 test could not be performed without building some type of enclosure to test the baghouse. The P08 Sander Baghouse emissions do not exit through a standard stack, but are emitted through a series of vents in a 360-degree configuration. Finally, on December 7, 1999, the Department received a letter from Stimson that stated they had decided to proceed with the emissions testing in January 2000, after reviewing the manufacturer's performance specifications and some alterations made to the system since the original 1973 installation. Thus, Stimson had withdrawn their request to suspend testing on the P08 Sander Baghouse.

The Department granted Stimson's request to suspend semiannual Method 9 tests for the following sources: S08 Planer Baghouse #4, C01 Planer Shavings Cyclone, C03 Fines Pipe Cyclone, C06 Beauty Bark Cyclone, and C12 Carpenter Shop Cyclone. The S08 Planer Baghouse #4 is no longer on site, as the planer line, cyclone baghouse were sold, dismantled, and removed from the facility. All references to the S08 Planer Baghouse #4 were removed from OP2806-01. For the remaining cyclones, the Department added a statement to the operating permit that suspended Method 9 testing for those sources that are not operating. The C01 Planer Shavings Cyclone is located on top of the "A" frame fuel storage building and was an alternate for shavings; but is no longer connected to any ductwork. The C03 Fines Pipe Cyclone is also located on the "A" frame; but is not connected to any ductwork. The C06 Beauty Bark Cyclone is located on top of the belt-fed bark bin and is not connected to any material-transporting ductwork. Finally, the Carpenter Shop Cyclone is no longer connected to any machinery with the movement of the table saw to the warehouse.

Stimson provided comments during the public comment period on the draft permit. The comments resulted in adding the C13 Rail Chip Cyclone and the F14 Rail Chip Surge Bin Loadout to the operating permit and deleting the C12 Carpenter Shop Cyclone from the permit. Permit OP2806-01 was issued final and effective on May 14, 2000.

A portion of Missoula County is designated as a PM<sub>10</sub> non-attainment area. Stimson is located about 2 miles east of the non-attainment border. The Montana State Implementation Plan does not apply any operating restrictions to the Bonner facility.

Stimson was issued Permit #OP2806-02 final and effective on January 14, 2003. The permitting action was an administrative amendment based on a request submitted by Stimson on September 9, 2002, to change the responsible official for the facility. Dan Sweeney replaced Jeff Webber in that capacity.

#### **D. Current Permitting Action OP2806-03**

The current permitting action is an administrative amendment to Permit #OP2806-02 to update language currently stated in Section V.B.3 that requires identification of the methods used to determine compliance for each term or condition in the permit, and then to state whether those methods are "continuous or intermittent," and to list the compliance status of the term or condition in the permit. The new permit language requires determination if compliance is "continuous or intermittent."

**E. Taking and Damaging Analysis**

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. The checklist was completed on January 28, 1998, for OP2806-00, on December 13, 1999, for Permit OP2806-01, on November 8, 2002, for Permit 2806-02, and on November 3 2003 for Permit #OP2806-03.

**F. Compliance Designation**

Stimson was inspected by the Department on August 12, 1996, September 18, 1997, September 14, 1998, November 15, 1999, November 15, 2001, July 26, 2002, and July 18, 2003. On all these occasions, the facility was found to be in compliance with all applicable requirements and limitations.

Since Stimson acquired the Bonner facility in 1994 there have been six documented violations of the 20% opacity limit for the #1 wood-fired boiler; the last of which occurred in August 1997. A consent decree, which covered the first four violations, was signed between Stimson and the Department on December 5, 1996, which required Stimson to perform inspections and modifications to the #1 boiler and scrubber to increase the particulate control. In response to the opacity violations, and subsequent order, Stimson installed an automated control system on the boiler and has rebuilt the internals of the scrubber. The actions required by the consent decree have been completed

On August 5, 1997, the Department air quality inspector again documented a violation of the 20% opacity limit on the #1 boiler. Also, an inspector from Missoula County documented a violation of the same limit on August 7, 1997. Subsequent to this violation, Stimson discovered the damper to the scrubber bypass was not completely shut, as had been previously thought. Both consultants and the company, during the inspections required by the consent decree, had overlooked this. A winch was placed on the damper arm and the damper was closed completely. This action caused a reduction in both opacity and temperature of the boiler stack gases, indicating that some bypassing of the scrubber had been occurring.

The Department considers the matter of the opacity violations of August 5 and August 7 resolved and will not take further action. Stimson is considered by the Department to be in compliance with all applicable requirements at the time of issuance of this permit.

## SECTION II. SUMMARY OF EMISSION UNITS

### A. Facility Process Description

Stimson's Bonner operation consists of both a plywood mill and a stud-grade lumber mill. The two mills are essentially separate, other than sharing the same hog-fuel boiler as a steam source. Stimson also operates two waste-water treatment plants and a landfill at the Bonner site. One water treatment plant handles waste water from the plywood plant and the other handles water from the remainder of the plant, as well as the discharge from the city of Bonner. The landfill is a class III landfill and accepts only log yard waste.

The sawmill includes debarkers, saws, chippers, drying kilns, planers, and product storage. The byproducts of lumber manufacturing are sawdust, wood chips, planer shavings, and hog fuel. These byproducts may be burned in the hog-fuel boiler or stored in bins until the material is sold and transferred off site.

The plywood plant uses raw logs, which are first debarked and cut to length. The logs are soaked in hot water baths prior to being lathed into veneer sheets. The veneer sheets are then dried, using steam from the hog-fuel boiler and "laid-up" into the plywood panels using foam glue. Defects in the veneer can be removed and plugged with the common football shaped inserts. A scarfing machine can also be used to join shorter sheets of veneer into longer sheets. Prepresses, and then the large plywood presses, provide the necessary pressure and steam heat to bond the veneer into plywood. Defects in the plywood face are filled with patching compound and some species of wood are sized with urea to prevent the surface from fuzzing prior to the sheets being sanded, trimmed, bundled and stored for shipment. By-products from the plywood process are essentially the same as those from the stud mill.

Steam for the facility is provided by a Riley-Stoker hog-fuel boiler rated at 200,000 lbs of steam per hour. The boiler's air intake includes the exhaust from the veneer dryers to control particulate and VOC emissions from the dryers and the boiler exhaust is controlled by a wet scrubber. A Nebraska natural gas-fired boiler rated at 70,000 lbs of steam per hour is used as a backup. Nitrogen oxide emissions from this boiler are controlled through the use of flue gas recirculation.

### B. Emission Units and Pollution Control Device Identification

| EU ID | Description                              | Pollution Control Device/Practice |
|-------|--|-----------------------------------|
| S01   | Sawmill Log Debarker                     | None                              |
| S02   | Sawmill Bucking Saws                     | None                              |
| S03   | Sawmill Hog Fuel and Chips Handling      | None                              |
| S04   | Chip Storage Pile                        | None                              |
| S05   | Sawmill Building                         | Building provides some PM control |
| S06   | Lumber Dry Kilns                         | None                              |
| S07   | Planer Baghouse #3                       | Baghouse is control device        |
| P01   | Plywood Log Debarker                     | None                              |
| P02   | Plywood Mill Bucking Saws                | None                              |
| P03   | Plywood Mill Hog Fuel and Chips Handling | None                              |
| P04   | Lathe Rejects Screening                  | None                              |
| P05   | Plywood Building                         | None                              |
| P06   | Plywood Layup Baghouse                   | Baghouse is control device        |
| P07   | Hog Press Sawline Baghouse               | Baghouse is control device        |

| <b>EU ID</b> | <b>Description</b>  | <b>Pollution Control Device/Practice</b>            |
|--------------|---|---|
| P08          | Sander Baghouse   | Baghouse is control device                          |
| P09          | Saw Baghouse  | Baghouse is control device                          |
| P10          | Plywood Press Vent  | None  |
| P11          | Knife Grinding Room   | None  |
| P12          | Plywood Veneer Dryers   | Dryer Exhaust Gas Routed to Boiler                  |
| P13          | Plywood Prime Line (Duratemp® Prime Line)   | None  |
| B01          | Boiler #1 (Hog fuel fired)  | Wet Scrubber  |
| B03          | Boiler #3 (Natural gas fired)   | Flue gas recirculation                              |
| F01          | Beauty Bark Processing  | None  |
| F02          | Landfill  | None  |
| F03          | Outdoor Fuel Storage Pile   | None  |
| F04          | Indoor Fuel Storage Pile  | None  |
| F05          | A-frame Shavings & Bark Bin Loadout   | None  |
| F06          | Plywood Chip Bin loadout  | None  |
| F08          | Log Yard Leveling   | None  |
| F09          | Waste Water Treatment Plant   | None  |
| F10          | #1 Baghouse on A-frame  | Baghouse is control device                          |
| F11          | #2 Baghouse on A-frame  | Baghouse is control device                          |
| F12          | Boiler Sander Dust Baghouse   | Baghouse is control device                          |
| F13          | Fugitive Emissions: Vehicle Traffic   | Unpaved roads are watered as needed to control dust |
| F14          | Rail Chip Surge Bin Loadout   | None  |
| H01          | Vehicle Fueling Tanks (Gasoline - 1000 gal, Diesel - 12,000; 10,000; 8000; 8000 and 500 gal | Submerged Fill Pipes                                |
| H03          | Maintenance Activities  | None  |
| C01          | Planer Shavings Cyclone (not in use)  | Cyclone is control device                           |
| C02          | Plywood Fines Cyclone   | Cyclone is control device                           |
| C03          | Fines Pipe Cyclone (not in use)   | Cyclone is control device                           |
| C04          | Shavings Bin Cyclone  | Cyclone is control device                           |
| C05          | Fines Pipe Cyclone (not in use)   | Cyclone is control device                           |
| C06          | Beauty Bark Bin Cyclone (not in use)  | Cyclone is control device                           |
| C07          | Cyclone for Auxiliary Fuel System   | Cyclone is control device                           |
| C08          | Plywood Fines Bin Cyclone   | Cyclone is control device                           |
| C09          | Fishtail Saw Cyclone above #1 Surge Bin   | Cyclone is control device                           |
| C10          | Processor Chips Cyclone above #3 Surge bin  | Cyclone is control device                           |
| C11          | Sawmill Chips Cyclone   | Cyclone is control device                           |
| C13          | Rail Chip Cyclone   | Cyclone is control device                           |

In submitting their operating permit application, Stimson did not list the veneer dryers as an emissions unit because the exhaust is routed to the wood-fired boiler for incineration. However, the dryers do have applicable requirements and, therefore, must be addressed separately.

The Administrative Rules of Montana (ARM) 17.8.1201(22)(a) defines an insignificant emission unit as one that emits less than 5 tons per year of any regulated pollutant, has the potential to emit less than 500 pounds per year of lead or any hazardous air pollutant, and is not regulated by any applicable requirement other than a generally applicable requirement. The list of insignificant emitting units at the Stimson facility includes the Sawmill Log Debarker (S01), the Chipper Cyclone (S04), the Sawmill Building (S05), the Knife Grinding Room (P11), the Landfill (F04), the Indoor and Outdoor Fuel Storage Piles (F03 and F04), the Logyard Leveling (F08), and the Waste Water Treatment Plants (F09).



### SECTION III. PERMIT TERMS

#### A. Emission Limits and Standards

##### #1 Boiler (B01)

The Department has determined that the emission limits that apply to the #1 boiler are both 0.15 gr/dscf from Preconstruction Permit #2606-03 and the limit as calculated from the fuel burning equation in ARM 17.8.309 - Particulate Matter, Fuel Burning Equipment. Because of the fluctuations in flue gas flow rate, in relation to heat input level, the Department is not able to verify one limit as being more stringent; therefore, both shall apply. The fuel burning equation is:

$$E=1.026 * H^{0.235}$$

Where H is the heat input in MMBtu per hour and E is the maximum allowable particulate emissions rate in lbs. per MMBtu.

For indicating compliance with the particulate and opacity limits, the Department has added an additional requirement to monitor and record the differential pressure across the wet scrubber, which controls emissions from the wood-fired boiler. Also added is the requirement to monitor the differential pressure in the duct-routing veneer dryer exhaust gas to the boiler to ensure that the veneer gas incineration system is operating properly.

##### Boiler #3 (B3)

The emission limits for this natural gas-fired boiler are as specified in Stimson's Preconstruction Permit #2806-04.

##### Veneer Dryers (P12)

Because the emissions from the veneer dryers are routed to the boiler for control, no emission limits apply to the dryers themselves. The only requirement is that the veneer dryer exhaust gas incineration system is in operation whenever the dryers are operating.

##### Plywood Layup Baghouse (P06)

The emission limit for the Plywood Layup Baghouse is as specified in Preconstruction Permit #2806-04.

##### Plywood Prime Line (Duratemp® Prime Line) (P13)

The emission limit for the Plywood Layup Baghouse is as specified in Preconstruction Permit #2806-04.

No other emissions units at the facility contain source specific emissions limits or conditions.

#### B. Stratospheric Ozone Depleting Substances

Stimson does not manufacture, sell, distribute, or use in the manufacturing of a product, any stratospheric ozone-depleting substances. Therefore, the 1990 Clean Air Act, as amended, Sections 601-608, do not apply to the facility, except that air conditioning and fire extinguishers, or other equipment containing Class I or Class II substances, must be serviced by certified repair persons to ensure that the substances are recycled or destroyed appropriately.

## **C. Monitoring and Testing Requirements**

The requirement for testing, monitoring, record keeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor for all emission units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions.

When compliance with the underlying applicable requirement for an emissions unit is not threatened by lack of regular monitoring, and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo (i.e., no monitoring) will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring and/or record keeping for all generally applicable requirements such as ARM 17.8.304, 308, 310, 322, and 324.

The information obtained from the monitoring and record keeping will be used by the permittee to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards. If it is determined, through testing using test methods identified in the Montana Source Testing Protocol, that Stimson is out of compliance with any applicable requirement, Stimson will not be shielded from an enforcement action even if the required monitoring methods listed in the permit indicate compliance with the applicable requirement.

For example, there are no monitoring requirements for ARM 17.8.310 (particulate emissions from process weight) for the process cyclones. If the Department required a Method 5 test on one of these cyclones and it was found to be out of compliance with the emission limit, then the Department would have cause for an enforcement action. Similarly, if Stimson performed visual surveys for the raw material handling points as required by the permit and determined, based on the performance of the visual surveys, that Stimson was in compliance with ARM 17.8.308, but an inspector performed a Method 9 test and determined that there was an opacity violation, then Stimson would be subject to enforcement even though the monitoring indicated compliance.

The operating permit may not necessarily require testing for all sources, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct compliance testing to confirm compliance status. All compliance testing must be performed in compliance with the Montana Source Test Protocol and Procedures Manual.

### **Boiler #1 (B01)**

Boiler #1 was last tested for particulate in May 1997. However, Stimson has not had to perform ongoing testing on this unit. The Department has added testing and monitoring requirements to the operating permit in order to demonstrate continuous compliance with applicable requirements and ensure proper operation of the boiler and control equipment.

The Department has determined that a Reference Method 9 Opacity Test at least once every six months and a Reference Method 5 Particulate test every four years, as well as hourly monitoring of the differential pressure across the wet scrubber, is sufficient to demonstrate compliance with the applicable opacity and particulate limits.

### **Boiler #3 (B03)**

Because this natural gas-fired boiler is used only as a backup to boiler #1 and will not be used on a continuous basis, the Department has not required any ongoing testing of this source. The use of only natural gas as a fuel is considered sufficient to demonstrate compliance with the opacity, particulate and sulfur in fuel limitations. This does not preclude the Department from initiating enforcement proceedings if reference method testing indicates that the source is in violation. Reference Method testing for NOx and CO may be required if the Department feels it is necessary.

### **Veneer Dryers (P12)**

The veneer dryers are not vented directly to the atmosphere but are vented to the #1 boiler for VOC and particulate. Therefore, no direct testing of the dryer exhaust is required. The Department has determined that hourly monitoring of the exhaust duct pressure is sufficient to ensure that the system is operational.

### **Plywood Layup Baghouse (P06)**

The Department has determined that opacity testing every six months and particulate testing every four years are sufficient to demonstrate compliance with the applicable requirements for the baghouse.

### **Hog Fuel and Chips Handling - Plywood Mill (P03) and Sawmill (S03)**

The fuel handling system can be a significant source of fugitive emissions at the Stimson facility. To ensure compliance with the opacity limitations, the Department has required Stimson to perform weekly surveys of the facility. Stimson is required to make a conscious effort to locate and mitigate sources of fugitive emissions. The surveys do not include performing an actual visual emissions observation in accordance with Method 9, but the individual performing the survey should be familiar with the concepts of the Reference Method.

### **Hog Press Sawline Baghouse (P07) and Sander Baghouse (P08)**

The Hog Press Sawline Baghouse and the Sander Baghouse have not been required to perform testing on an ongoing basis in the past. However, these are the two largest baghouses at the Bonner facility, with design airflows of 48,200 scfm and potential uncontrolled particulate emissions of 54 and 96 tons per year. Based on the Department's testing policy, particulate testing every four years is warranted. The Department has decided that this testing schedule, along with weekly checks for visible emissions, will be adequate to demonstrate continuing compliance with the applicable requirements.

**Miscellaneous Baghouses** - Planer Baghouse #3 (S07), Planer Baghouse #4 (S08), Plywood Saw Baghouse (P09), #1 A-frame Baghouse (F10), #2 A-frame Baghouse (F-11), Boiler Sander Dust Baghouse (F12)

These baghouses all have potential uncontrolled emission rates of five to ten tons per year and are considered minor sources at the facility. The Department has determined that ongoing particulate testing is not warranted for these sources and that monthly checks for visible emissions are sufficient to demonstrate continuing compliance. This does not preclude the Department from requiring Stimson to perform a source test on any of these sources if the test is warranted.

**Material Handling Cyclones** - Planer Shavings Cyclone (C01), Plywood Fines Cyclone (C02),

Fines Pipe Cyclone (C03), Shavings Bin Cyclone (C04), Fines Pipe Cyclone (C05), Beauty Bark Bin Cyclone (C06), Auxiliary Fuel System Cyclone (C07), Plywood Fines Bin Cyclone (C08), Fishtail Saw Cyclone (C09), Processor Chips Cyclone (C10), Sawmill Chips Cyclone (C11), (C13) Rail Chip Cyclone

Emissions from cyclones have been shown to be fairly consistent, assuming that the primary air mover is operating. Excess emissions can occur, but they typically don't occur suddenly as with the failure of a bag in a baghouse or the loss of liquid level in a scrubber. Failure occurs gradually when erosion over a longer period of time causes a breach of the exterior shell or a failure of an internal component. The Department has determined that semiannual Method 9 visual emissions observations are sufficient to demonstrate compliance with the opacity and particulate limitations.

The Department has also determined that regularly scheduled particulate testing is not required. However, the Department reserves the right to require Stimson to perform particulate testing if there is indication of excess particulate loading.

### **Fugitive Emissions From Vehicle Traffic (F13)**

Fugitive emissions from vehicles can be a significant source of fugitive emissions at the Stimson facility. To ensure compliance with the opacity limitations, the Department has required Stimson to perform weekly surveys of the facility. Stimson is required to make a conscious effort to locate and mitigate sources of fugitive emissions. The surveys do not include performing an actual visual emissions observation in accordance with Method 9, but the individual performing the survey should be familiar with the concepts of the Reference Method.

**Miscellaneous Minor sources** - Plywood Log Debarker (P01), Sawmill Bucking Saws (S02), Plywood Bucking Saws (P02), Dry Kilns (S06), Lathe Rejects Screening (P04), Plywood Building (P05), Plywood Press Vent (P10), Beauty Bark Processing (F01), A-Frame Shavings and Bark Bin Loadout (F05), Plywood Chip Bin Loadout (F06), (F14) Rail Chip Surge Bin Loadout

These sources are subject only to the general opacity and process weight particulate limits and are minor contributors to the overall particulate loading from the facility. Method 5 testing for particulate is not feasible on these sources; therefore, the Department has determined that weekly visual surveys and normal operations are sufficient to demonstrate continued compliance with the applicable requirements.

### **Plywood Prime Line (Duratemp® Prime Line) (P13)**

This source is subject to general opacity and a VOC emission limit. Method 9 testing for this source is not feasible. Furthermore, there is a small likelihood that the Plywood Prime Line would ever violate the standard. The Department has determined that using only water-based pigment coatings for all coating processes associated with the Duratemp® Prime Line and keeping records will suffice for verifying compliance with the VOC emission limit.

## **D. Recordkeeping Requirements**

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record.

**E. Reporting Requirements**

The reporting requirements are included in the permit for each emissions unit and Section V-General Conditions of the operating permit explains the reporting requirements. However, the permittee is required to submit semiannual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The report will include a list of all emission limits and monitoring deviations, the reason for any deviation, and the corrective action as a result of the deviation.

**F. Public Notice**

As this permitting action reflects an administrative amendment, no public notice is required for this action.

#### SECTION IV. NON-APPLICABLE REQUIREMENTS ANALYSIS

Stimson Lumber Company requested a permit shield from all requirements that were identified as non-applicable in its permit application. Section IV of the operating permit “Non-applicable Requirements” contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements Stimson identified as non-applicable in the permit application, but will not be included in the operating permit as non-applicable. The table includes both the applicable requirement and reason that the Department did not identify this requirement as non-applicable.

| Applicable Requirement   | Reason(s) for Not Including in Permit  |
|--|--|
| 40 CFR 61 Subpart A – General Provisions<br>40 CFR 63 Subpart A – General Provisions | These federal regulations consist of an applicability statement. These regulations may not be applicable to the source at this time; however, these regulations may become applicable during the life of the permit. |
| 17.8.1423 – Standards of Performance for New Stationary Sources                      | This rule incorporates the requirements of 40 CFR Part 60. The Nebraska boiler is subject to the requirements of 40 CFR Part 60 Subpart Dc   |

## **SECTION V. FUTURE PERMIT CONSIDERATIONS**

### **A. MACT Standards**

Stimson submitted a Part 1 Application for Case-by-Case MACT Determination on May 13, 2002. Two possible MACT rules were identified. These are 40 CFR 63, Subpart DDDDD - Institutional Boilers and Process Heaters (proposed January 13, 2003) and 40 CFR 63, Subpart DDDD - Plywood and Composite Wood Products Manufacturing (proposed January 9, 2003).

### **B. NESHAP Standards**

As of the date of issuance of this permit, the Department is not aware of any future NESHAPS standards that may be promulgated that will affect this facility.

### **C. NSPS Standards**

As of the date of issuance of this permit, the Department is not aware of any future NSPS standards that may be promulgated that would affect this facility.

### **D. Risk Management Plan**

As of the date of issuance of this permit, this facility does not have any substance listed in 40 CFR 68.115 or 40 CFR 68.130 that exceeds the minimum threshold quantities. Consequently, this facility is not required to submit a Risk Management Plan.